INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

November 25, 2003

TO: Interested Parties / Applicant

RE: Heartland Automotive, LLC / MSM 133-18004-00027

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

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November 25, 2003

Mr. Lou Gudino
Heartland Automotive, LLC
P.O. Box 648
Greencastle, Indiana 46135-0648

Re: 133-18004-00027
Minor Source Modification to:
Part 70 Operating Permit No.: T 133-12495-00027

Dear Mr. Gudino:

Heartland Automotive, LLC was issued Part 70 Operating Permit T 133-12495-00027 on June 14, 2001 for a plastic automotive parts surface coating source. An application to modify the source was received on September 19, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless

Joseph E. Kernan
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modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the source modification has been issued. The source must comply with the requirements of 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12 before operation of any of the proposed emission units can begin.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL/MES
cc: File - Warren County
Warren County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner

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MINOR SOURCE MODIFICATION
PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Heartland Automotive, LLC
300 South Warren Drive
Greencastle, Indiana 46135

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No. 133-18004-00027	Sections Affected: A.2, D.1, Quarterly Report Form
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 25, 2003

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary plastic automotive parts surface coating source.

Responsible Official:	Soji Honma
Source Address:	300 South Warren Drive, Greencastle, Indiana 46135
Mailing Address:	P.O. Box 648, Greencastle, Indiana 46135
General Source Phone Number:	(765) 653-4263
SIC Code:	3089, 3999
County Location:	Putnam
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.

(b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.

(c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.

(d) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.

(e) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.

(f) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.

(b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.

(c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.

(d) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.

(e) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

D.1.3 Volatile Organic Compounds [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the four (4) surface coating booths (WSB-1, WSB-2, SB-1 and SB-2) has been determined to be:

(1) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 49.0 tons per twelve (12) consecutive month period;

(2) The method of application at the four (4) surface coating booths (WSB-1, WSB-2, SB-1 and SB-2) shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and

(3) The following management and work practices shall apply:

(A) Operator training course.

(B) Spray gun cleaning.

(C) The cleanup solvent containers used to transport solvent from drums/ containers to work stations be closed containers having soft gasketed closures.

(D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(E) Storage containers used to store VOC containing materials shall be kept covered when not in use.

(F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(b) Any change or modification which would increase the potential to emit VOC from the adhesive application booth, known as AB-1, to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

D.1.4 HAPs [326 IAC 2-4.1-1]

(a) The total amount of any single HAP and combination of HAPs delivered to the applicators of the two (2) surface coating booths (SB-1 and SB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period respectively. Therefore, the requirements of 326 IAC 2-4.1-1 (New source toxics control) do not apply.

(b) Any change or modification which would increase the potential to emit a single HAP or a combination of HAPs from the adhesive application booth, known as AB-1, or the two (2) spray booths (WSB-1 and WSB-2) to ten (10) tons per year or more or twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAQ.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the door panel assembly line (VF/EF/HS), the touch-up paint booth (TPB), the adhesive application booth (AB-1), the two (2) surface coating booths (WSB-1 and WSB-2), and the two (2) surface coating booths (SB-1 and SB-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the adhesive application booth (AB-1), the two (2) surface coating booths (WSB-1 and WSB-2), the two (2) surface coating booths (SB-1 and SB-2) and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAPs usage limitations contained in Conditions D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 VOC Emissions

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.9 HAPs Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month based on the HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Particulate Matter (PM)

(a) In order to comply with Condition D.1.5, the dry filters for PM overspray control shall be in operation at all times when the adhesive application booth (AB-1) and the two (2) surface coating booths (SB-1 and SB-2) are in operation.

(b) In order to comply with Condition D.1.5, the water curtain for PM overspray control shall be in operation at all times when the two (2) surface coating booths (WSB-1 and WSB-2) are in operation.

D.1.11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks C-4, WS-1, SB-1 and SB-2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) The Permittee shall record the flow rate of the water curtain at least once per shift when the one (1) surface coating line is in operation. When for any one reading, the flow rate of the water curtain is outside the normal range of 190 and 232 gallons of water per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.3 (a) and (b) and D.1.4 (a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and usage requirements and/or the VOC and HAPs emission limits and emission requirements established in Conditions D.1.3 and D.1.4.

(1) The amount of VOC in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to

verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain once per shift records of the water curtain flow rate, a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3(a) and D.1.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.14 Notification Requirements [40 CFR 63.4510]

(a) General. You must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial notification. You must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) you must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.

(c) Notification of compliance status. You must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Mailing Address: P.O. Box 648, Greencastle, Indiana 46135
Part 70 Permit No.: T 133-12495-00027
Facilities: Four (4) surface coating booths (WSB-1, WSB-2, SB-1 and SB-2)
Parameter: Total VOC delivered to the applicators
Limit: Less than 49.0 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this month.

? Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by:

Title/Position:

Signature:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70
Minor Source Modification and Significant Permit Modification

Source Background and Description

Source Name:	**Heartland Automotive, LLC**
Source Location:	**300 South Warren Drive, Greencastle, Indiana 46135**
County:	**Putnam**
SIC Code:	**3089**
Operation Permit No.:	**T 133-12495-00027**
Operation Permit Issuance Date:	**June 14, 2001**
Minor Source Modification No.:	**133-18004-00027**
Significant Permit Modification No.:	**133-18195-00027**
Permit Reviewer:	**Edward A. Longenberger**

The Office of Air Quality (OAQ) has reviewed a modification application from Heartland Automotive, LLC relating to the construction and operation of the following emission units and pollution control devices:

Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.

History

Heartland Automotive, LLC was issued a Part 70 permit on June 14, 2001. On September 19, 2003, Heartland Automotive, LLC submitted an application to the OAQ requesting to add two (2) spray booths to their existing plants. The proposed booths have potential VOC emissions less than twenty-five (25) tons per year. The source requests that the proposed new booths be limited under the existing limit of less than 49.0 tons of VOC per year for existing booths SB-1 and SB-2. The applicant is not requesting any increase in the permitted VOC emission limits.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (?F)
WS-1	WSB-1 and WSB-2	25.0	6.55	5300	70

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 19, 2003.

Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	16.5
PM_{10}	16.5
SO_2	-
VOC	21.1
CO	-
NO_X	-

HAPs	**Potential To Emit** (tons/year)
Glycol Ethers	1.20
Triethylamine	0.223
TOTAL	1.39

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(8), because the potential VOC

emissions from the modification are less than twenty-five (25) tons per year but greater than ten (10) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 133-18195-00027) in accordance with 326 IAC 2-7-12(b)(1)(E) and 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Putnam County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	21.5
PM_{10}	22.6
SO_2	0.144
VOC	249.33
CO	20.2
NO_X	24.1

(a) This existing source is not a major stationary source because no attainment regulated

pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Technical Support Document (TSD) for SSM 133-15489-00027.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit of Modification (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Modification	16.7	16.7	-	0.00*	-	-	1.39
PSD Threshold Level	250	250	250	250	250	250	-

* The VOC emissions from the proposed new spray booths (WSB-1 and WSB-2) shall be limited by the existing VOC limit of less than 49.0 tons per year for spray booths SB-1 and SB-2, which is contained in Condition D.1.2 of the Part 70 Operating Permit. Therefore, the increase in VOC emissions as a result of this modification is zero, for the purposes of PSD applicability.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

(a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for with the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutants. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(c) The existing spray booths at this source which are engaged in the coating of plastic parts, as well as the proposed new spray booths at this source (WSB-1 and WSB-2), are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart PPPP, for Surface Coating of Plastic Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, http://www.epa.gov/ttn/oarpg/t3pfpr.html, and will be published in the Federal Register.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326

IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart PPPP.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than 120 days after the effective date of 40 CFR 63, Subpart PPPP.

(2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

The VOC emissions from the proposed spray booths (WSB-1 and WSB-2) shall be limited under the existing VOC limitations for SB-1 and SB-2. Therefore, there is no increase in potential VOC emissions, and this source remains a minor source with respect to 326 IAC 2-2.

326 IAC 2-4.1 (New source toxics control)

The potential to emit HAPs from the proposed spray booths (WSB-1 and WSB-2) are less than ten (10) tons per year for the worst case single HAP, and less than twenty-five (25) tons per year for total HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the two (2) spray booths (WSB-1 and WSB-2) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Under the rule revision, particulate from the two (2) spray booths (WSB-1 and WSB-2) shall be

controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The proposed spray booths shall be limited under the existing BACT limit of less than 49.0 tons per year for spray booths SB-1 and SB-2. There will be no increase in VOC emissions due to this modification, therefore, the requirements of 326 IAC 8-1-6 are satisfied.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths Stack WS-1 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the water curtain for the surface coating booths

must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.

(b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.

(c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.

(**d** ~~c~~) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.

(**e** ~~d~~) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.

(**f** ~~e~~) One (1) surface coating line, with a capacity of 57.7 vehicles per hour, consisting of three (3) spray booths in series, using high-volume low-pressure (HVLP) spray equipment, equipped with a wet scrubber for overspray control and exhausting to Stacks S-4 through S-7.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) door panel assembly line, identified as VF/EF/HS, consisting of three (3) processes, vacuum forming, exhausted through Stack C-1, edge folding, exhausted through Stack C-2, both installed in May 1989, and hot stake, exhausted through Stack C-3, installed in February 1999, capacity: 150 door panels per hour.

(b) Two (2) surface coating booths, identified as SB-1 and SB-2, installed in 1999, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stacks SB-1 and SB-2, capacity: 62.5 plastic automotive parts per hour.

(c) Two (2) surface coating booths, identified as WSB-1 and WSB-2, equipped with HVLP spray applicators and a water curtain for PM overspray control, exhausted through Stack WS-1, capacity: 33 plastic instrument panels per hour.

(**d** ~~c~~) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack C-4, capacity: 250 plastic automotive parts per hour.

(**e** ~~d~~) One (1) touch-up paint booth, identified as TPB exhausted through Stack D, installed in 1997, capacity: 13.89 plastic automotive parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/plastic/plasticpg.html. Pursuant to 40 CFR 63.4483(b),

the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

(1) All coating operations as defined in 40 CFR 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.

D.1.~~3~~**1** Volatile Organic Compounds [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the **four** ~~two~~ (**4** ~~2~~) surface coating booths (**WSB-1, WSB-2,** SB-1 and SB-2) has been determined to be:

(1) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 49.0 tons per twelve (12) consecutive month period;

(2) The method of application at the **four** ~~two~~ (**4** ~~2~~) surface coating booths (**WSB-1, WSB-2,** SB-1 and SB-2) shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and

(3) The following management and work practices shall apply:

(A) Operator training course.

(B) Spray gun cleaning.

(C) The cleanup solvent containers used to transport solvent from drums/ containers to work stations be closed containers having soft gasketed closures.

(D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(E) Storage containers used to store VOC containing materials shall be kept covered when not in use.

(F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(b) Any change or modification which would increase the potential to emit VOC from the adhesive application booth, known as AB-1, to twenty-five (25) tons per year or more, shall obtain prior approval from IDEM, OAQ.

D.1.~~4~~**2** HAPs [326 IAC 2-4.1-1]

(a) The total amount of any single HAP and combination of HAPs delivered to the applicators of the two (2) surface coating booths (SB-1 and SB-2) shall be limited to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-4.1-1 (New source toxics control) do not apply.

(b) Any change or modification which would increase the potential to emit a single HAP or a combination of HAPs from the adhesive application booth, known as AB-1, **or the two (2) spray booths (WSB-1 and WSB-2)** to ten (10) tons per year or more or twenty-five (25) tons per year or more, respectively, shall obtain prior approval from IDEM, OAQ.

D.1.~~5~~**3** Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the door panel assembly line (VF/EF/HS), the touch-up paint booth (TPB), the adhesive application booth (AB-1), **the two (2) surface coating booths (WSB-1 and WSB-2),** and the two (2) surface coating booths (SB-1 and SB-2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.~~6~~**4** Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the adhesive application booth (AB-1), **the two (2) surface coating booths (WSB-1 and WSB-2), the** two (2) surface coating booths (SB-1 and SB-2) and any control devices.

Compliance Determination Requirements

D.1.~~7~~**5** Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAPs usage limitations contained in Conditions D.1.~~3~~**1** and D.1.~~4~~**2** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.~~8~~**6** VOC Emissions

Compliance with Condition D.1.~~3~~**1** shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.~~9~~**7** HAPs Emissions

Compliance with Condition D.1.~~12~~**13** shall be demonstrated within 30 days of the end of each month based on the HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.**10**~~8~~ Particulate Matter (PM)

(a) In order to comply with Condition D.1.**5**~~3~~, the dry filters for PM overspray control shall be in operation at all times when the adhesive application booth (AB-1) and the two (2) surface coating booths (SB-1 and SB-2) are in operation.

(b) In order to comply with Condition D.1.5, the water curtain for PM overspray control shall be in operation at all times when the two (2) surface coating booths (WSB-1 and WSB-2) are in operation.

D.1.**11**~~9~~ Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks C-4, WS-1, SB-1 and SB-2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) The Permittee shall record the flow rate of the water curtain at least once per shift when the one (1) surface coating line is in operation. When for any one reading, the flow rate of the water curtain is outside the normal range of 190 and 232 gallons of water per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(**d** ~~c~~) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.**12**~~10~~ Record Keeping Requirements

(a) To document compliance with Conditions D.1.**3**~~1~~ (a) and (b) and D.1.**4**~~2~~ (a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and usage requirements and/or the VOC and HAPs emission limits and emission requirements established in Conditions D.1.**3**~~1~~ and D.1.**4**~~2~~.

(1) The amount of VOC in each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.**10**~~8~~ and D.1.**11**~~9~~, the Permittee shall maintain **once per shift records of the water curtain flow rate,** a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.1**3**~~1~~ Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.**3**~~1~~(a) and D.1.**4**~~2~~(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.14 Notification Requirements [40 CFR 63.4510]

(a) General. You must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial notification. You must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) you must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If you are using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for your plastic part coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart. If you are complying with another NESHAP that constitutes the predominant activity at your facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.

(c) Notification of compliance status. You must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source. The notification of compliance status

must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Mailing Address: P.O. Box 648, Greencastle, Indiana 46135
Part 70 Permit No.: T 133-12495-00027
Facilities: **Four** ~~two~~ (**4** ~~2~~) surface coating booths (**WSB-1, WSB-2,** SB-1 and SB-2)
Parameter: Total VOC delivered to the applicators
Limit: Less than 49.0 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

? No deviation occurred in this month.

? Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by:

Title/Position:

Signature:

Date:

Phone:

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. **133-18004-00027** and Part 70 Significant Permit Modification No. **133-18195-00027**.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Heartland Automotive**
Address City IN Zip: **300 South Warren Drive, Greencastle, Indiana 46135**
MSM: **133-18004**
Plt ID: **133-00027**
Reviewer: **Edward A. Longenberger**
Date: **September 19, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
WSB-1 and WSB-2																
(Mix #1)																
Base	10.25	38.74%	34.95%	3.79%	43.00%	52.01%	0.07031	33	0.68	0.39	0.90	21.63	3.95	15.95	0.75	75%
Reducer	8.47	100.00%	35.98%	64.02%	36.57%	0.00%	0.01406	33	8.55	5.42	2.52	60.39	11.02	0.00	N/A	75%
Catalyst	8.58	60.00%	60.00%	0.00%	61.81%	38.19%	0.00563	33	0.00	0.00	0.00	0.00	0.00	0.70	0.00	75%
As Applied	**9.87**	**48.11%**	**36.45%**	**11.66%**	**43.17%**	**43.02%**	**0.09000**	**33**	**2.02**	**1.15**	**3.42**	**82.03**	**14.97**	**16.65**	**2.67**	**75%**
(Mix #2)																
Base	9.40	44.52%	40.85%	3.67%	46.11%	49.49%	0.07813	33	0.64	0.34	0.89	21.35	3.90	14.72	0.70	75%
Reducer	8.47	100.00%	35.98%	64.02%	36.57%	0.00%	0.01563	33	8.55	5.42	2.80	67.10	12.25	0.00	N/A	75%
Catalyst	8.58	60.00%	60.00%	0.00%	61.81%	38.19%	0.00625	33	0.00	0.00	0.00	0.00	0.00	0.78	0.00	75%
As Applied	**9.20**	**53.40%**	**41.27%**	**12.13%**	**45.60%**	**41.05%**	**0.10000**	**33**	**2.05**	**1.12**	**3.69**	**88.45**	**16.14**	**15.50**	**2.72**	**75%**
(Mix #3)																
Base	10.25	38.74%	34.95%	3.79%	43.00%	52.01%	0.07031	33	0.68	0.39	0.90	21.63	3.95	15.95	0.75	75%
Thinner	7.63	100.00%	0.00%	100.00%	0.00%	0.00%	0.01406	33	7.63	7.63	3.54	84.98	15.51	0.00	N/A	75%
Catalyst	8.58	60.00%	60.00%	0.00%	61.81%	38.19%	0.00563	33	0.00	0.00	0.00	0.00	0.00	0.70	0.00	75%
As Applied	**9.74**	**47.41%**	**32.05%**	**15.36%**	**37.46%**	**43.02%**	**0.09000**	**33**	**2.39**	**1.50**	**4.44**	**106.61**	**19.46**	**16.65**	**3.48**	**75%**
(Mix #4)																
Base	9.40	44.52%	40.85%	3.67%	46.11%	49.49%	0.07813	33	0.64	0.34	0.89	21.35	3.90	14.72	0.70	75%
Thinner	7.63	100.00%	0.00%	100.00%	0.00%	0.00%	0.01563	33	7.63	7.63	3.93	94.42	17.23	0.00	N/A	75%
Catalyst	8.58	60.00%	60.00%	0.00%	61.81%	38.19%	0.00625	33	0.00	0.00	0.00	0.00	0.00	0.78	0.00	75%
As Applied	**9.07**	**52.73%**	**36.61%**	**16.11%**	**39.89%**	**41.05%**	**0.10000**	**33**	**2.43**	**1.46**	**4.82**	**115.77**	**21.13**	**15.50**	**3.56**	**75%**

PM Control Efficiency: 95.00%

State Potential Emissions	**Add worst case coating to all solvents**	**Uncontrolled**	**4.82**	**115.77**	**21.13**	**16.65**
		Controlled	**4.82**	**115.77**	**21.13**	**0.833**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Heartland Automotive
Address City IN Zip: 300 South Warren Drive, Greencastle, Indiana 46135
MSM: 133-18004
Plt ID: 133-00027
Reviewer: Edward A. Longenberger
Date: September 19, 2003

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Volatile (H2O and Organics)	Weight % Glycol Ethers	Weight % Triethylamine	Glycol Ethers Emissions (ton/yr)	Triethylamine Emissions (ton/yr)	lb HAP per lb coating solids
WSB-1 and WSB-2									
(Mix #1)									
Base	10.25	0.07031	33.000	38.74%	1.15%	0.18%	1.198	0.188	0.022
Reducer	8.47	0.01406	33.000	100.00%	0.00%	0.00%	0.000	0.000	N/A
Catalyst	8.58	0.00563	33.000	60.00%	0.00%	0.00%	0.000	0.000	0.000
(Mix #2)									
Base	9.40	0.07813	33.000	44.52%	0.90%	0.21%	0.955	0.223	0.020
Reducer	8.47	0.01563	33.000	100.00%	0.00%	0.00%	0.000	0.000	N/A
Catalyst	8.58	0.00625	33.000	60.00%	0.00%	0.00%	0.000	0.000	0.000
(Mix #3)									
Base	10.25	0.07031	33.000	38.74%	1.15%	0.18%	1.198	0.188	0.022
Thinner	7.63	0.01406	33.000	100.00%	0.00%	0.00%	0.000	0.000	N/A
Catalyst	8.58	0.00563	33.000	60.00%	0.00%	0.00%	0.000	0.000	0.000
(Mix #4)									
Base	9.40	0.07813	33.000	44.52%	0.90%	0.21%	0.955	0.223	0.020
Thinner	7.63	0.01563	33.000	100.00%	0.00%	0.00%	0.000	0.000	N/A
Catalyst	8.58	0.00625	33.000	60.00%	0.00%	0.00%	0.000	0.000	0.000
Total State Potential Emissions						**Individual HAPs**	**1.20**	**0.223**	
						Total HAPs	**1.39**		

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs